

W A S A T C H



Clean Air Coalition

December 2, 2013¹

Bryce Bird, Director
Utah Division of Air Quality

Thank you for the opportunity to comment on the PM_{2.5} SIP Subsections IX.H.11, 12 and 13. Control Measures for Area and Point Sources, Emission Limits and Operating Practices.

Re: Petroleum Refineries:

...B. FCCU PM Emissions

I. By no later than January 1, 2018, each owner or operator of an FCCU shall comply with an emission limit of 1.0 pounds PM per 1000 pounds coke burned on a 3-hour average basis.

II. Compliance with this limit shall be determined by following the stack test protocol specified in 40 C.F.R. §60.106(b) to measure PM emissions on the FCCU. Each owner operator shall conduct stack tests once every five years at each FCCU.

COMMENT

A 3-hour average cannot be enforced by a stack test every 5 years. Refineries need to comply with § 60.105a (b) (1) The owner or operator shall install, operate, and maintain continuous parameter monitor systems (CPMS) to measure and record operating parameters for each control device...

Re: ATK LAUNCH SYSTEMS – PROMONTORY

- i. General Conditions B. During the period November 1 to February 28 annually, on days when the PM_{2.5} levels exceed 35 ug/m³ at the nearest real-time monitoring station, the following shall not be tested: ...

CO MMENT

This language should be modified to match the language mandatory no-burn language proposed in

R307-302-3 (4) When the ambient concentration of PM2.5 measured by are forecasted to reach or exceed 25 micrograms per cubic meter, the director will issue a public announcement to provide broad notification that a mandatory no-burn period.

ATK should not be allowed to test propellant, energetics, pyrotechnics, flares and other reactive compounds or fire rocket motors during inversions.

Thank you for your attention to these comments.

Peace,
Kathy Van Dame, Policy Coordinator
1148 East 6600 South
Salt Lake City, Utah 84121
(801)261-5989 dvd.kvd@juno.com